

EXHIBIT A

to Xioahua Wu's Amended Motion to Compel Discovery from Motorola

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA, INC., a Delaware corporation,)	
)	
Plaintiff/Counter-Defendant,)	
)	
v.)	Case No. 08 CV 5427
)	
XIAOHUA WU, et al.,)	Judge Matthew F. Kennelly
)	
Defendants/Counter-Plaintiffs,)	Magistrate Judge Geraldine Soat Brown
)	
and)	
)	
HANJUAN JIN, et al.,)	
)	
Defendants.)	
)	

XIAOHUA WU'S FIRST SET OF INTERROGATORIES TO MOTOROLA

Pursuant to Fed. R. Civ. P. 33 and 26(e), Defendant/Counter-Plaintiff Xiaohua Wu ("Wu") hereby requests that Plaintiff/Counter-Defendant Motorola, Inc. ("Motorola") answer under oath each of the following Interrogatories set forth below, in accordance with the Definitions and Instructions herein, and serve a copy of such answers within thirty (30) days of the date of service.

Definitions and Instructions

1. The term "Motorola" shall refer to Plaintiff/Counter-Defendant Motorola, Inc., and any current or former affiliated or related entities, including, but not limited to, parent companies, subsidiaries, predecessors and joint ventures, as well as any of their current or former officers, directors, employees, attorneys, agents, consultants and other persons acting or purporting to act on Motorola's behalf.
2. The term "Wu" shall refer to Defendant/Counter-Plaintiff Xiaohua Wu.
3. The term "person" means any natural person, corporation, company, association, partnership, firm, governmental body, hospital, charitable institution or other entity.

4. The words "identify" or "identity," when used with regard to a natural person, require that the full name, current or last known residential address, and current or last known residential and cellular telephone number of such person be provided, along with the name, address and telephone number of such person's current or last known employer.

5. The words "identify" or "identity," when used with regard to a person (other than a natural person) as defined herein, require that the current or last known legal name, current or last known corporate headquarters, principal place of business or primary office address and telephone number be provided.

6. "Date" means the exact day, month, and year if ascertainable, or if not ascertainable, the best approximation of the date. An approximation may include explaining the date in terms of relationship to other events.

7. Unless the text clearly requires otherwise, you should interpret the singular form of a word to include the plural and vice versa; the conjunctive "and" to include the disjunctive "or" and vice versa; the word "any" to include the word "all" and vice versa; and the past tense of a word to include the present tense and vice versa.

8. If you object to any interrogatory, please specify which part is objectionable and the reasons for the objection.

Interrogatories

1. Identify each person who participated in answering these interrogatories and, if different, the person signing the answers.

ANSWER:

2. Identify each person who participated in and/or was aware of Motorola's internal investigation of Wu prior to December 13, 2007, and, for each such person, state the date(s) of their participation in and/or their awareness of the investigation and describe in detail their role in the investigation.

ANSWER:

3. State the date(s) on which Motorola performed its internal investigation of Wu, and, for each such date, describe in detail the activities performed as part of, or in furtherance of, the investigation. In particular, state the date(s) Motorola examined and/or reviewed Wu's Motorola network activity records and/or Wu's access to Motorola databases, the date(s) Motorola captured and/or analyzed forensic copies of Wu's computer drives, the date(s) Motorola accessed and/or reviewed Wu's e-mail traffic over Motorola networks, and the date(s) Motorola interviewed Wu.

ANSWER:

4. Identify each person whose Motorola network activity records were examined and/or reviewed as part of the internal investigation commenced by Motorola allegedly as a result of Hanjuan Jin being detained at O'Hare Airport in February, 2007.

ANSWER:

5. Identify each person who accessed Motorola computer networks remotely using a non-Motorola computer from January 1, 2000 to December 13, 2007, and, for each such person, if said access was approved by Motorola, identify the person who approved the access and state the date of said approval, and if said access was not approved by Motorola, state the date Motorola learned of the access and what, if any, disciplinary action was taken against the person who accessed the network.

ANSWER:

6. Identify each person whose e-mail traffic over Motorola networks was accessed and/or reviewed as part of the internal investigation commenced by Motorola allegedly as a result of Hanjuan Jin being detained at O'Hare Airport in February, 2007.

ANSWER:

7. Identify each person who e-mailed over a Motorola network a file or any information that Motorola alleges constitutes or contains Motorola trade secrets and/or confidential and proprietary information to a non-Motorola e-mail account from January 1, 2000 to December 13, 2007, and, for each such person, state the date Motorola learned of the e-mail activity and what, if any, disciplinary action was taken against the person.

ANSWER:

8. Identify each person who worked in Motorola's Office of Ethics and Compliance from February 1, 2007 to December 13, 2007, and, for each such person, describe in detail the nature of their work and their duties and responsibilities.

ANSWER:

9. Identify each person who allegedly recommended or who participated in or was aware of the decision to recommend that Wu be terminated from her employment at Motorola, and, for each such person, describe in detail the nature of their involvement in, or awareness of, the decision to recommend Wu's termination.

ANSWER:

10. Identify each person who was a member of and/or was aware of the work of the Intellectual Property Award Plan Committee which considered the innovation co-developed by Wu and referenced in Motorola's summary judgment motion, and, for each such person, state the date(s) of their work on the Committee and describe in detail the nature of their work on the Committee.

ANSWER:

11. Identify each person who disclosed to a Motorola Intellectual Property Award Plan Committee any source code and algorithmic innovation similar to Wu's innovation from January 1, 2000, to the present, and, for each such person, state the date of each such disclosure and Motorola's disposition of the disclosure.

ANSWER:

12. Identify each person who participated in or became aware of all or any part of the substance of the conference call involving Paul Bartusiak, Wu and others on or about May 17, 2007, and referenced in Wu's Counterclaim against Motorola, and, for each such person, state if they participated in the conference call and, if not, from whom and when they became aware of all or any part of the substance of said conference call.

ANSWER:

13. Identify each person who, on behalf of Motorola or as a Motorola employee, participated in or became aware of all or any part of the substance of the discussion(s) between Motorola and Company A (as so identified in Wu's Counterclaim by order of the Court) regarding the IPR review performed by Motorola as part of the Company A project in 2007, and, for each such person, if they participated in said discussion(s), state the date(s) of such participation and describe in detail the nature of their participation, or if they did not participate in said discussion(s) but became aware of all or any part of the substance of same, state the date(s) they became aware of the discussion(s) and describe in detail what they were told about the substance of said discussion(s).

ANSWER:

Date: September 21, 2010

/s/ William J. Leonard

William J. Leonard (IL Atty No. 6225444)
williamjleonard@yahoo.com

Wang, Leonard & Condon

33 N. LaSalle Street, Suite 2020
Chicago, Illinois 60602
Off: (312) 782-1668
Fax: (312) 782-1669

Attorney for Defendant/Counter-Plaintiff Xiaohua Wu

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the attached **XIAOHUA WU'S FIRST SET OF INTERROGATORIES TO MOTOROLA** was served via electronic mail, this 21st day of September, 2010, upon the following:

Robert Mark Halligan rhalligan@nixonpeabody.com
Jodi Rosen Wine jwine@nixonpeabody.com
Deanna R. Swits dswits@nixonpeabody.com
Jason T. Kunze jkunze@nixonpeabody.com
Michael Christian Hallerud hallerud@nixonpeabody.com
Nixon Peabody LLP
300 S. Riverside Plaza, Suite 1600
Chicago, IL 60601-3213

Michael Dean Karpeles karpelesm@gtlaw.com
Charles B. Leuin leuinc@gtlaw.com
Jonathan Hale Claydon claydonj@gtlaw.com
Richard Daniel Harris harrisr@gtlaw.com
Barry Ryan Horwitz horwitzb@gtlaw.com
Greenberg Traurig
77 W. Wacker Dr., Suite 3100
Chicago, IL 60601

Michael Paul Persoon mike.persoon@gmail.com
Jorge Sanchez attysanchez@gmail.com
Thomas Howard Geoghegan dsg77@aim.com
Despres Schwartz & Geoghegan, Ltd.
77 W. Washington St., Suite 711
Chicago, IL 60602

Telly Stefaneas telly_stefaneas@me.com
Cantwell & Cantwell
30 N. LaSalle St., Suite 2850
Chicago, IL 60602

Gregory Adam Adamski GAAdamski@adamskiandconti.com
Adamski & Conti
100 N. LaSalle St., Suite 1720
Chicago, IL 60602

Isabella I. Wells isabellawells@gmail.com
Isabella I. Wells, P.C.
415 N. LaSalle St., Suite 301
Chicago, IL 60654

H. Michael Hartmann mhartmann@leydig.com
David M. Airan dairan@leydig.com
Leydig Voit & Mayer Ltd.
Two Prudential Plaza
180 North Stetson Avenue, Suite 4900
Chicago, IL 60601-6731

Stanley Young syoung@cov.com
Robert T Haslam rhaslam@cov.com
Ashley Elizabeth Miller amiller@cov.com
Matthew James Hawkinson mhawkinson@cov.com
Michael Patrick Wickey mwickey@cov.com
Nitin Subhedar nsubhedar@cov.com
Covington & Burling LLP
333 Twin Dolphin Dr., Suite 700
Redwood Shores, CA 94065